

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 20-cr-20336

Honorable Gershwin A. Drain

vs.

Chestria Bell,

Defendant.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of providing notice of the forfeiture allegations contained in the Indictment, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 21 U.S.C. § 853, 18 U.S.C. § 924(d) and 28 U.S.C. § 2461 which includes, but is not limited to:

- \$21,651.00 U.S. Currency;
- \$263,068.00 U.S. Currency; and
- Assorted Jewelry, VL: \$47,630.00, including, but not limited to: 14 kt Yellow Gold Cuban Link Chain, 14 kt Yellow Gold Cuban Link Bracelet, 10 kt Yellow Gold Bead Link Chain and 14 kt Yellow Gold Jesus Charm, 10 kt Yellow Gold Diamond Charm with 72 Round Diamonds, Man's Stainless Steel Replica Breitling Watch, Man's Stainless Steel Oyster Perpetual Date Just Rolex 16220 Watch, No Name Replica Yellow Tone Watch, Sterling Silver Praying Hands Charm, 18 kt Yellow Gold Diamond Eternity Band with Round Diamonds, Mens 14 kt Yellow Gold Diamond Ring with 37 Round Diamonds, Mens 10 kt Two Tone Diamond Ring with 24 Round Diamonds, Mens 14 kt White Gold Diamond Ring with Diamonds, and Ladies 14 kt White Gold Miche Diamond Halo Wedding Set.

This Forfeiture Bill of Particulars is also filed to comply with the provisions of 18 U.S.C. § 983(a)(3), and the government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

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Respectfully submitted,

Matthew Schneider
United States Attorney

S/Gjon Juncaj
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Dated: January 5, 2021

Certification of Service

I hereby certify that on January 5, 2021, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

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